IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

A.J. and Q.C.,)
Plaintiff,) NO. 1:23-CV-04247-JPB
v.)
MASP, LLC,)
Defendant.)

NOTICE OF INTENT TO SERVE AMENDED SUBPOENAS

TO: Patrick J. McDonough, Esq., Jonathan S. Tonge, Esq., Jennifer M. Webster, Esq.

PLEASE TAKE NOTICE, pursuant to Federal Rule of Civil Procedure 45, that our client intends to serve subpoenas in the forms attached hereto, on the following non-parties on August 14, 2024, or as soon thereafter as service may be effectuated.

Baymont Inn and Suites 2170 Delk Road, S.E. Marietta, Georgia 30067

Days Inn By Windham 2191 Northwest Parkway SE Marietta, GA 30067 Days Inn By Windham 2191 Northwest Parkway SE Marietta, GA 30067

Knights Inn 2859 Panola Road, Lithonia, Georgia 30058

Knights Inn 2942 Lawrenceville Highway Tucker, Georgia 30084

> Master's Inn 1435 Montreal Road Tucker, Georgia 30084

Motel 6 2820 Chamblee Tucker Road Atlanta, Georgia 30341

Quality Inn 2170 Delk Road S.E., Marietta, Georgia 30067

Quality Inn 3500 Venture Parkway, N.W. Duluth, Georgia 30096

Red Roof Inn 2200 Corporate Plaza Smyrna, Georgia 30080

Studio 6 1795 Crescent Centre Blvd Tucker, GA 30084 This 13th day of August, 2024.

SWIFT, CURRIE, McGHEE & HIERS, LLP

By: /s/ Marissa H. Merrill
KORI E. WAGNER
Georgia State Bar No. 155438
MARISSA H. MERRILL
Georgia State Bar No. 216039
TRACY A. GILMORE
Georgia State Bar No. 633193
Attorneys for Defendant

1420 Peachtree Street, N.E. Suite 800 Atlanta, Georgia 30309
Telephone: (404) 874-8800
Kori.wagner@swiftcurrie.com
Marissa.merrill@swiftcurrie.com
Tracy.gilmore@swiftcurrie.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing NOTICE OF INTENT TO SERVE SUBPOENAS has been filed electronically with the Clerk of Court this 13th day of August, 2024, who will automatically send a copy of the NOTICE OF INTENT TO SERVE SUBPOENAS to the attorneys for the Plaintiff named below:

Patrick J. McDonough
Jonathan S. Tonge
Jennifer M. Webster
Andersen, Tate & Carr, P.C.
pmcdonough@atclawfirm.com
jtonge@atclawfirm.com
jwebster@atclawfirm.com

This 13th day of August, 2024.

SWIFT, CURRIE, McGHEE & HIERS, LLP

By: /s/ Marissa H. Merrill
KORI E. WAGNER
Georgia State Bar No. 155438
MARISSA H. MERRILL
Georgia State Bar No. 216039
TRACY A. GILMORE
Georgia State Bar No. 633193
Attorneys for Defendant

1420 Peachtree Street, N.E. Suite 800

Atlanta, Georgia 30309

Telephone: (404) 874-8800 Facsimile: (404) 888-6188

Kori.wagner@swiftcurrie.com Marissa.merrill@swiftcurrie.com Tracy.gilmore@swiftcurrie.com

CERTIFICATE OF COMPLIANCE WITH LR 5.1 (C)

This is to certify that the foregoing submission to the court was prepared using Times New Roman 14 point in accordance with LR 5.1(C).

This 13th day of August, 2024.

SWIFT, CURRIE, McGHEE & HIERS, LLP

By: /s/ Marissa H. Merrill

KORI E. WAGNER

Georgia State Bar No. 155438

MARISSA H. MERRILL

Georgia State Bar No. 216039

TRACY A. GILMORE

Georgia State Bar No. 633193

Attorneys for Defendant

1420 Peachtree Street, N.E. Suite 800

Atlanta, Georgia 30309 Telephone: (404) 874-8800

Facsimile: (404) 888-6188

Kori.wagner@swiftcurrie.com

Marissa.merrill@swiftcurrie.com

Tracy.gilmore@swiftcurrie.com

4866-2170-4407, v. 1

AO 88B (Rev. 01/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises

	UNITED S	TATES DISTRIC	T COURT
	NORTH	for the HERN DISTRICT OF GEO ATLANTA DIVISION	DRGIA
A.J. an	d Q.C.,)	
	Plaintiff,))) Civil Actio	on No. 1:23-CV-04247-JPB
v.)	
MASP,	,LLC,)	
	Defendant.)	
	SUBPOENA TO PRODUC OR TO PER	E DOCUMENTS, INFORMIT INSPECTION OF	
То:	Baymont Inn and Suites 2170 Delk Road, S.E. Marietta, Georgia 30067		
docume	Production: YOU ARE COMMANDE ents, electronically stored information, or all: SEE EXHIBIT "A" ATTACHED HI	objects, and permit their in	date, and place set forth below the following spection, copying, testing, or sampling of the
Place:	Swift, Currie, McGhee & Hiers, LLP 1420 Peachtree Street, NE Suite 800 Atlanta, Georgia 30309		d Time: per 6, 2024 at 10:00 a.m.
property	Inspection of Premises: YOU ARE CO y possessed or controlled by you at the timeasure, survey, photograph, test, or san	ime, date, and location set	try onto the designated premises, land, or other forth below, so that the requesting party may signated object or operation on it.
Place:		Date and	d Time:
attached	(e), relating to your duty to respond to i.	elating to your protection a o this subpoena and the p	s a person subject to a subpoena, and Rule 45 potential consequences of not doing so, are
Date:	August 14, 2024 CLERK OF COURT		
		OR	Kori E. Wagner
	Signature of Clerk or Dept	uty Clerk	Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing MASP, LLC who issues or requests this subpoena, is: Kori Wagner, Marissa Merrill and Tracy Gilmore, Swift, Currie, McGhee & Heirs, LLP, 1420 Peachtree Street, NE, Suite 800, Atlanta, GA 3030, (404) 874-8800, Kori.wagner@swiftcurrie.com, Marissa.merrill, Tracy.gilmore@swiftcurrie.com

AO 88B (Rev. 2/09) Su	bpoena to Produce I	Documents, Information,	or Objects or to	Permit Ins	spection of P	Premises (Page 2)
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Civil Action No. 1:23-CV-04247-JPB

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

(1 ms section should not be filed with the court unless required by Fed. R. Civ. 1. 45.)
This subpoena for (name of individual and title, if any)
was received by me on (date)
☐ I personally served the subpoena on the individual at (place) on (date) ; or
I left the subpoena at the individual's residence or usual place of abode with (name) , a person of suitable
age and discretion who resides there, on (date) and mailed a copy to the individual's last known address; or
I served the subpoena to (name of individual) , who is designated by law to accept service of process on
behalf of (name of organization) on (date) ; or
☐ I returned the subpoena unexecuted because ; or
other (specify):
Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of
\$
Market Control of the
My fees are \$ for travel and \$ for services, for a total of \$
I declare under penalty of perjury that this information is true.
Λ
Date: 08/14/2024
Server's signature Lisa M. Adair, Paralegal
Printed name and title
1420 Peachtree St. NE, Suite 800, Atlanta, GA 30309
Server's address
A I Pois and a Committee of the Committe

Additional information regarding attempted service, etc: *Served via Certified Mail*

Federal Rule of Civil Procedure 45 (c), (d), and (e) (Effective 12/1/07)

(c) Protecting a Person Subject to a Subpoena.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- At any time, on notice to the commanded person, the serving party may move the issuing court for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance. (3) Quashing or Modifying a Subpoena.
- (A) When Required. On timely motion, the issuing court must quash or modify a subpoena that:
 - (i) fails to allow a reasonable time to comply;
- (ii) requires a person who is neither a party nor a party's officer to travel more than 100 miles from where that person resides, is employed, or regularly transacts business in person except that, subject to Rule 45(c)(3)(B)(iii), the person may be commanded to attend a trial by traveling from any such place within the state where the trial is held;
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
 - (iv)subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the issuing court may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information;
- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party; or
- (iii) a person who is neither a party nor a party's officer to incur substantial expense to travel more than 100 miles to attend trial.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(d) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information.

 These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
 - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.
- (e) Contempt. The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty's failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(ii).

4873-3342-4855, v. 1

EXHIBIT "A" **BAYMONT INN AND SUITES**

A certified copy of:

- All registration receipts for guest A.J.
 All check-out folios for guest A.J. (A
 All check-in folios for guest A.J. (A
 Copies of licenses or identification for A.J. (A

- 5. Receipts or documents indicating payment for a room issued to guest A.J. (

4861-7035-5927, v. 1

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

A.J. and Q.C.,)
Plaintiff,)) Civil Action No. 1:23-CV-04247-JPB
v.) CIVII ACIIOII No. 1.23-CV-04247-JPB
MASP, LLC,)
Defendant.)

CERTIFICATE OF AUTHENTICATION PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 45

THE UNDERSIGNED, ________, certifies same is a person responsible for the keeping of records for **BAYMONT INN AND SUITES**, and the within and attached records are true and accurate reproductions and copies of the records of this facility, which were kept in the aforesaid facility and that said records were kept as reasonably necessary for record keeping.

THIS CERTIFICATE is given pursuant to Federal Rule of Civil Procedure 45 in lieu of the personal appearance of the person certifying hereto, and in connection with a lawsuit involving A.J. and Q.C. v. MASP, LLC.

THE UNDERSIGNED further certifies that said records with this attached		
Certificate were delivered (pursuant t	o Federal Rule of Civil Procedure 45) to, Kori	
E. Wagner, Attorney of Record for I	MASP, LLC who is the counsel who sought	
production.		
	Records Custodian	
	(Please print name)	
SWORN TO AND SUBSCRIBED Before me this day of	20	
Defore the this day of	, 20	

Notary Public [SEAL]

4892-6221-5127, v. 1

My Commission Expires:

AO 88B (Rev. 01/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises

		UNITED STATI	ES DISTRIC	T COURT
			for the DISTRICT OF GEO NTA DIVISION	DRGIA
A.J. an	d Q.C.,	2)	
	Plaintiff,))) Civil Actio	on No. 1:23-CV-04247-JPB
v.)	
MASP.	, LLC,)	
	Defendant.)	
	SUBF	POENA TO PRODUCE DOC OR TO PERMIT IN		
То:	Days Inn By V 2191 Northwe Marietta, GA	est Parkway SE		
docume	ents, electronically	U ARE COMMANDED to prostored information, or objects, I "A" ATTACHED HERETO	and permit their in	date, and place set forth below the following spection, copying, testing, or sampling of the
Place:		McGhee & Hiers, LLP Street, NE Suite 800 ia 30309	Date and Septemb	d Time: per 6, 2024 at 10:00 a.m.
propert	y possessed or co	ntrolled by you at the time, dat	te, and location set	try onto the designated premises, land, or other forth below, so that the requesting party massignated object or operation on it.
Place:			Date and	d Time:
(d) and attached Date:	(e), relating to y	Fed. R. Civ. P. 45(c), relating to your duty to respond to this s	to your protection a ubpoena and the p	s a person subject to a subpoena, and Rule 45 potential consequences of not doing so, are
		CLERK OF COURT	OR	Kori E. Wagner
		Signature of Clerk or Deputy Clerk		Attorney's signature
		DISTRIBUTE OF CIETA OF DEPUTY CIEFA		AUDITICE S SIGNALUI E

The name, address, e-mail, and telephone number of the attorney representing MASP. LLC who issues or requests this subpoena, is: Kori Wagner, Marissa Merrill and Tracy Gilmore, Swift, Currie, McGhee & Heirs, LLP, 1420 Peachtree Street, NE, Suite 800, Atlanta, GA 3030, (404) 874-8800, Kori.wagner@swiftcurric.com, Marissa.merrill, Tracy.gilmore@swiftcurric.com

AO 88B (Rev. 2/09) Subpoena to Produce Do	ocuments, Information, or Objects or	to Permit Inspection of Premises (Page	2
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Civil Action No. 1:23-CV-04247-JPB

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

This subpoena for (name of individual and title, if any)	
was received by me on (date)	
☐ I personally served the subpoena on the individual at (place) on (date) ; or	
☐ I left the subpoena at the individual's residence or usual place of abode with (name) , a person of suita	able
age and discretion who resides there, on (date) , and mailed a copy to the individual's last known address;	or
I served the subpoena to (name of individual) , who is designated by law to accept service of process on	
behalf of (name of organization) on (date) ; or	
☐ I returned the subpoena unexecuted because ; or	
other (specify):	
Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of	
\$	
My fees are \$ for travel and \$ for services, for a total of \$	
I declare under penalty of perjury that this information is true.	
late: 08/14/2024	
Server's signature Lisa M. Adair, Paralegal	
Printed name and title	
1420 Peachtree St. NE, Suite 800, Atlanta, GA 30309	
Server's address	

Additional information regarding attempted service, etc: *Served via Certified Mail*

Federal Rule of Civil Procedure 45 (c), (d), and (e) (Effective 12/1/07)

(c) Protecting a Person Subject to a Subpoena.

- (1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction which may include lost earnings and reasonable attorney's fees on a party or attorney who fails to comply.
 - (2) Command to Produce Materials or Permit Inspection.
- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the issuing court for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance. (3) Quashing or Modifying a Subpoena.
- (A) When Required. On timely motion, the issuing court must quash or modify a subpoena that:
 - (i) fails to allow a reasonable time to comply:
- (ii) requires a person who is neither a party nor a party's officer to travel more than 100 miles from where that person resides, is employed, or regularly transacts business in person except that, subject to Rule 45(c)(3)(B)(iii), the person may be commanded to attend a trial by traveling from any such place within the state where the trial is held;
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
 - (iv)subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the issuing court may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information;
- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party; or
- (iii) a person who is neither a party nor a party's officer to incur substantial expense to travel more than 100 miles to attend trial.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

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- (1) Producing Documents or Electronically Stored Information.

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- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.
- (2) Claiming Privilege or Protection.
- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
 - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.
- (e) Contempt. The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty's failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(ii).

4880-0634-8503, v. 1

EXHIBIT "A" DAYS INN BY WINDHAM

A certified copy of:

- All registration receipts for guests Corey E. Jackson_and/or A.J. (Amage),
 All check-out folios for guest Corey E. Jackson_and/or A.J. (Amage),
- 3. All check-in folios for guest Corey E. Jackson and/or A.J. (
- 4. Copies of licenses or identification for either guests Corey E. Jackson_and/or A.J.
- 5. Receipts or documentation evidencing payment for a room issued to guests Corey E. Jackson and/or A.J. (Application)

4870-1216-6359, v. 1

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

A.J. and Q.C.,)
Plaintiff,)) Ciril Antique No. 1-22 CM 04247 IDE
v.) Civil Action No. 1:23-CV-04247-JPE)
MASP, LLC,)
Defendant.)

CERTIFICATE OF AUTHENTICATION PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 45

THE UNDERSIGNED, ________, certifies same is a person responsible for the keeping of records for **DAYS INN BY WINDHAM**, and the within and attached records are true and accurate reproductions and copies of the records of this facility, which were kept in the aforesaid facility and that said records were kept as reasonably necessary for record keeping.

THIS CERTIFICATE is given pursuant to Federal Rule of Civil Procedure 45 in lieu of the personal appearance of the person certifying hereto, and in connection with a lawsuit involving A.J. and Q.C. v. MASP, LLC.

THE UNDERSIGNED further certifies that said records with this attached Certificate were delivered (pursuant to Federal Rule of Civil Procedure 45) to, Kori E. Wagner, Attorney of Record for MASP, LLC who is the counsel who sought production.

	Records Custodian	
	(Please print name)	
SWORN TO AND SUBSCRIBED Before me this day of	, 20	
Notary Public [SEAL] My Commission Expires:	,	

4882-9051-2855, v. 1

AO 88B (Rev. 01/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises

		DISTRICT COURT
	NORTHERN DIST	the RICT OF GEORGIA A DIVISION
A.J. ar	nd Q.C.,)
	Plaintiff,))
v.) Civil Action No. 1:23-CV-04247-JPB
MASP	P, LLC,))
	Defendant.	,))
		ENTS, INFORMATION, OR OBJECTS ECTION OF PREMISES
Го:	Extended Stay America 3430 Venture Parkway, N.W. Duluth, Georgia 30096	
docum	Production: YOU ARE COMMANDED to produce ents, electronically stored information, or objects, and al: SEE EXHIBIT "A" ATTACHED HERETO.	e at the time, date, and place set forth below the following permit their inspection, copying, testing, or sampling of the
Place:	Swift, Currie, McGhee & Hiers, LLP 1420 Peachtree Street, NE Suite 800 Atlanta, Georgia 30309	Date and Time: September 6, 2024 at 10:00 a.m.
oropert		Ito permit entry onto the designated premises, land, or other d location set forth below, so that the requesting party may erty or any designated object or operation on it.
Place:		Date and Time:
(d) and attache Date:	d (e), relating to your duty to respond to this subport. August 14, 2024	ur protection as a person subject to a subpoena, and Rule 45 ena and the potential consequences of not doing so, are
	CLERK OF COURT	OR Kori E. Wagner

The name, address, e-mail, and telephone number of the attorney representing MASP, LLC who issues or requests this subpoena, is: Kori Wagner, Marissa Merrill and Tracy Gilmore, Swift, Currie, McGhee & Heirs, LLP, 1420 Peachtree Street, NE, Suite 800, Atlanta, GA 3030, (404) 874-8800, Kori.wagner@swiftcurrie.com, Marissa.merrill, Tracy.gilmore@swiftcurrie.com

Attorney's signature

Signature of Clerk or Deputy Clerk

Δ	O 88B (Rev. 2/09)	Subnoena to Produce	Documents Information	or Objects or to Permi	it Inspection of Premises	Page 2
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Civil Action No. 1:23-CV-04247-JPB

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

This subpoena for (name of individual and title, if any)
was received by me on (date)
☐ I personally served the subpoena on the individual at (place) on (date); or ☐ I left the subpoena at the individual's residence or usual place of abode with (name), a person of suitable age and discretion who resides there, on (date), and mailed a copy to the individual's last known address; or ☐ I served the subpoena to (name of individual), who is designated by law to accept service of process on behalf of (name of organization) on (date); or ☐ I returned the subpoena unexecuted because; or
other (specify):
Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of \$ My fees are \$ for travel and \$ for services, for a total of \$
I declare under penalty of perjury that this information is true.
Date: 08/14/2024 Server's signature Lisa M. Adair, Paralegal
Printed name and title
1420 Peachtree St. NE, Suite 800, Atlanta, GA 30309
Server's address

Additional information regarding attempted service, etc: *Served via Certified Mail*

Federal Rule of Civil Procedure 45 (c), (d), and (e) (Effective 12/1/07)

(c) Protecting a Person Subject to a Subpoena.

- (1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction which may include lost earnings and reasonable attorney's fees on a party or attorney who fails to comply.
 - (2) Command to Produce Materials or Permit Inspection.
- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the issuing court for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance. (3) Quashing or Modifying a Subpoena.
- (A) When Required. On timely motion, the issuing court must quash or modify a subpoena that:
 - (i) fails to allow a reasonable time to comply;
- (ii) requires a person who is neither a party nor a party's officer to travel more than 100 miles from where that person resides, is employed, or regularly transacts business in person except that, subject to Rule 45(c)(3)(B)(iii), the person may be commanded to attend a trial by traveling from any such place within the state where the trial is held;
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
 - (iv)subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the issuing court may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information;
- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party; or
- (iii) a person who is neither a party nor a party's officer to incur substantial expense to travel more than 100 miles to attend trial.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

- (d) Duties in Responding to a Subpoena.
- (1) Producing Documents or Electronically Stored Information.

 These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

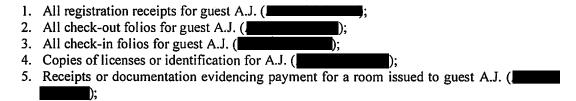
(2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
 - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.
- (e) Contempt. The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty's failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(ii).

4887-1282-6583, v. 1

EXHIBIT "A" EXTENDED STAY AMERICA

A certified copy of:



4882-0151-3175, v. 1

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

A.J. and Q.C.,)
Plaintiff,)))
v.) Civil Action No. 1:23-CV-04247-JPB
MASP, LLC,	
Defendant.)

CERTIFICATE OF AUTHENTICATION PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 45

THE UNDERSIGNED, _________, certifies same is a person responsible for the keeping of records for **EXTENDED STAY AMERICA**, and the within and attached records are true and accurate reproductions and copies of the records of this facility, which were kept in the aforesaid facility and that said records were kept as reasonably necessary for record keeping.

THIS CERTIFICATE is given pursuant to Federal Rule of Civil Procedure 45 in lieu of the personal appearance of the person certifying hereto, and in connection with a lawsuit involving A.J. and Q.C. v. MASP, LLC.

THE UNDERSIGNED further	certifies that said records with this attached
Certificate were delivered (pursuant to	o Federal Rule of Civil Procedure 45) to, Kori
E. Wagner, Attorney of Record for I	MASP, LLC who is the counsel who sought
production.	
•	
	Records Custodian
	(Please print name)
SWORN TO AND SUBSCRIBED Before me this day of	, 20
Notary Public [SEAL]	
My Commission Expires:	

4882-4083-6567, v. 1

AO 88B (Rev. 01/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises

		UNITED STATES	DISTRIC	T COURT
			or the	DRCIA
		NORTHERN DIS ATLAN	TRICT OF GEC TA DIVISION	JRGIA
A.J. and	d Q.C.,)	
	Plaintiff,)	
	Fiamun,) Civil Actio	on No. 1:23-CV-04247-JPB
v.)	
MASP,	LLC)	
wan.	DEC,)	
	Defendant.)	
	SUB	POENA TO PRODUCE DOCUM OR TO PERMIT INS		
То:	Knights Inn 2942 Lawren	ceville Highway		
	Tucker, Geor			
material	SEE EXHIBI	T "A" ATTACHED HERETO. McGhee & Hiers, LLP e Street, NE Suite 800	Date an	d Time: ber 6, 2024 at 10:00 a.m.
property	possessed or co	nemises: YOU ARE COMMAND on trolled by you at the time, date, photograph, test, or sample the pro-	and location set	try onto the designated premises, land, or other forth below, so that the requesting party may signated object or operation on it.
Place:			Date and	d Time:
(d) and attached	(e), relating to	your duty to respond to this sub		s a person subject to a subpoena, and Rule 45 potential consequences of not doing so, are
Date:	August 14, 2024	CLERK OF COURT		
			OR	Kori E. Wagner
		Signature of Clerk or Deputy Clerk	_	Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing MASP, LLC who issues or requests this subpoena, is: Kori Wagner, Marissa Merrill and Tracy Gilmore, Swift, Currie, McGhee & Heirs, LLP, 1420 Peachtree Street, NE, Suite 800, Atlanta, GA 3030, (404) 874-8800, Kori.wagner@swiftcurrie.com, Marissa.merrill.

Tracy.gilmore@swiftcurrie.com

O 88B (Rev. 2/09) Subpoena to Produc	e Documents, Information, or Objects or	to Permit Inspection of Premises (Page 2)
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Civil Action No. 1:23-CV-04247-JPB

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

1	(18)				
This subpoena for (name of	f individual and title, if any)				
was received by me on (da	te) .				
☐ I personally served the	ne subpoena on the indiv	ridual at (place)	on (date)	; or	
☐ I left the subpoena at	the individual's reside	nce or usual place	of abode with (name)	, a person of suitable
age and discretion who re	sides there, on (date)	, and mailed a c	opy to the indiv	vidual's la	st known address; or
☐ I sowed the subseque			-4-1114		C
I served the subpoen	550 W. Land Land 1-20 (1-20)(1-20 (1-20 (1-20 (1-20 (1-20 (1-20 (1-20 (1-20 (1-20 (1-20 (1-20 (1-20 (1-20 (1-20 (1-2) (1-20 (1-20 (1-20 (1-2) (1-20 (1-20 (1-2) (1-20 (1-20 (1-2) (1-20 (1-2) (1-20 (1-2) (1-20 (1-2) (1-20 (1-2) (1-20 (1-2) (1-20 (1-2) (1-20 (1-2) (1-20 (1-2) (1-20 (1-2) (1-2) (1-20 (1-2) (1		nated by law to a	ccept servi	ce of process on
behalf of (name of organization)	on (date)	; or			
☐ I returned the subpoo	ena unexecuted because	; or			
_	The state of the s	,			
other (specify):					
Unless the subpoena was	issued on behalf of the U	Inited States, or on	e of its officers of	or agents, I	have also
tendered to the witness fe	es for one day's attenda	nce, and the milea	ge allowed by la	aw, in the a	mount of
\$	3 0				
My fees are \$ for travel and	1\$ for services, f	for a total of \$			
o 2 (1995) 1997					
I declare under penalty o	f periury that this inform	ation is true			
- arrang aman paning a	perjury mar ano mrom	Λ			
Date: 08/14/2024	()	DOOL			
	4	Server'	s signature		
	Lisa M. A	Adair, Paralegal	s signature		
	-	Printed	name and title		
	1420 Pec	achtree St. NE, Suite 8	00, Atlanta, GA 30.	309	
	-	Server'	s address		
	25 2 2 2				

Additional information regarding attempted service, etc: *Served via Certified Mail*

Federal Rule of Civil Procedure 45 (c), (d), and (e) (Effective 12/1/07)

(c) Protecting a Person Subject to a Subpoena.

- (1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction which may include lost earnings and reasonable attorney's fees on a party or attorney who fails to comply.
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- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
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- (A) When Required. On timely motion, the issuing court must quash or modify a subpoena that:
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- (ii) requires a person who is neither a party nor a party's officer to travel more than 100 miles from where that person resides, is employed, or regularly transacts business in person except that, subject to Rule 45(c)(3)(B)(iii), the person may be commanded to attend a trial by traveling from any such place within the state where the trial is held;
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
 - (iv)subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the issuing court may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information;
- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party; or
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- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship, and
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- (2) Claiming Privilege or Protection.
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- (e) Contempt. The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty's failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(ii).

4886-6400-2263, v. 1

EXHIBIT "A" KNIGHTS INN TUCKER

A certified copy of:

- 5. Receipts or documentation evidencing payment for a room issued to guests Derrick Rogers and/or A.J. ().

4889-1677-3335, v. 1

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

A.J. and Q.C.,)
Plaintiff,))) Civil Action No. 1:23-CV-04247-JPB
v.) CIVII ACUOII NO. 1.23-CV-04247-JFE
MASP, LLC,)
Defendant.	.)

CERTIFICATE OF AUTHENTICATION PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 45

THE UNDERSIGNED, ________, certifies same is a person responsible for the keeping of records for **KNIGHTS INN TUCKER**, and the within and attached records are true and accurate reproductions and copies of the records of this facility, which were kept in the aforesaid facility and that said records were kept as reasonably necessary for record keeping.

THIS CERTIFICATE is given pursuant to Federal Rule of Civil Procedure 45 in lieu of the personal appearance of the person certifying hereto, and in connection with a lawsuit involving **A.J. and Q.C. v. MASP, LLC.**

THE UNDERSIGNED further certifies that said records with this attached

Certificate were delivered (pursuant to Federal Rule of Civil Procedure 45) to, Kori

E. Wagner, Attorney of Record for MASP, LLC who is the counsel who sought production.

Records Custodian

(Please print name)

SWORN TO AND SUBSCRIBED
Before me this _____ day of _______, 20____.

Notary Public [SEAL]

4884-0991-9447, v. 1

My Commission Expires:

AO 88B (Rev. 01/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises

UNITED STATES DISTRICT COURT for the NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION A.J. and Q.C., Plaintiff. Civil Action No. 1:23-CV-04247-JPB v. MASP, LLC, Defendant. SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES To: **Knights Inn** 2859 Panola Road Lithonia, Georgia 30058 Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material: SEE EXHIBIT "A" ATTACHED HERETO. Place: Swift, Currie, McGhee & Hiers, LLP Date and Time: 1420 Peachtree Street, NE Suite 800 September 6, 2024 at 10:00 a.m. Atlanta, Georgia 30309 Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it. Place: Date and Time: The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached. Date: August 14, 2024 CLERK OF COURT OR Kori E. Wagner

The name, address, e-mail, and telephone number of the attorney representing MASP, LLC who issues or requests this subpoena, is: Kori Wagner, Marissa Merrill and Tracy Gilmore, Swift, Currie, McGhee & Heirs, LLP, 1420 Peachtree Street, NE, Suite 800, Atlanta, GA 3030, (404) 874-8800, Kori.wagner@swiftcurrie.com, Marissa.merrill, Tracy.gilmore@swiftcurrie.com

Attorney's signature

Signature of Clerk or Deputy Clerk

AO 88B (Rev. 2/09) Subpoc	ena to Produce Documents.	Information, or Objects or to	Permit Ins	pection of Premises	(Page 2)
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Civil Action No. 1:23-CV-04247-JPB

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

(1 his section should not be ji	tea with the court unless required by Fea. R. Civ. P. 45.)
This subpoena for (name of individual and to	title, if any)
was received by me on (date)	
☐ I personally served the subpoena or	n the individual at (place) on (date) ; or
☐ I left the subpoena at the individua	al's residence or usual place of abode with (name), a person of suitable
age and discretion who resides there, on	(date) , and mailed a copy to the individual's last known address; or
I served the subpoena to (name of ind behalf of (name of organization) on (ividual) , who is designated by law to accept service of process on (date) ; or
☐ I returned the subpoena unexecuted	I because ; or
other (specify):	
	alf of the United States, or one of its officers or agents, I have also statendance, and the mileage allowed by law, in the amount of services, for a total of \$
I declare under penalty of perjury that t	his information is true.
Date: 08/14/2024	Hell
	Server's signature Lisa M. Adair, Paralegal
	Printed name and title
	1420 Peachtree St. NE, Suite 800, Atlanta, GA 30309
	Server's address

Additional information regarding attempted service, etc: Served via Certified Mail

Federal Rule of Civil Procedure 45 (c), (d), and (e) (Effective 12/1/07)

(c) Protecting a Person Subject to a Subpoena.

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- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party; or
- (iii) a person who is neither a party nor a party's officer to incur substantial expense to travel more than 100 miles to attend trial.
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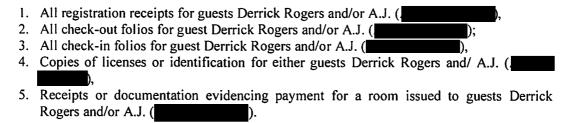
(2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
 - (i) expressly make the claim; and
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- (e) Contempt. The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty's failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(ii).

4895-6892-3351, v. 1

EXHIBIT "A" KNIGHT INN LITHONIA

A certified copy of:



4886-3031-5479, v. 1

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

A.J. and Q.C.,)
Plaintiff,)) Civil Action No. 1:23-CV-04247-JPE
v.)
MASP, LLC,)
Defendant.))

CERTIFICATE OF AUTHENTICATION PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 45

THE UNDERSIGNED, ________, certifies same is a person responsible for the keeping of records for **KNIGHTS INN**, and the within and attached records are true and accurate reproductions and copies of the records of this facility, which were kept in the aforesaid facility and that said records were kept as reasonably necessary for record keeping.

THIS CERTIFICATE is given pursuant to Federal Rule of Civil Procedure 45 in lieu of the personal appearance of the person certifying hereto, and in connection with a lawsuit involving A.J. and Q.C. v. MASP, LLC.

THE UNDERSIGNED further certifies that said records with this attached Certificate were delivered (pursuant to Federal Rule of Civil Procedure 45) to, Kori E. Wagner, Attorney of Record for MASP, LLC who is the counsel who sought production.

	Records Custodian
	(Please print name)
SWORN TO AND SUBSCRIBED Before me this day of	, 20
Notary Public [SEAL]	
My Commission Expires:	
4867-9884-7959, v. 1	

AO 88B (Rev. 01/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises

		UNITED STATES		T COURT
		NORTHERN DIST	r the RICT OF GEO A DIVISION	PRGIA
A.J. an	d Q.C.,)	
	Plaintiff,)	
v.) Civil Actio	on No. 1:23-CV-04247-JPB
MASP,	, LLC,)	
	Defendant.)	
	SUBPO	ENA TO PRODUCE DOCUM OR TO PERMIT INSP		
То:	Master's Inn 1435 Montreal Tucker, Georgi			
docume	ents, electronically s	ARE COMMANDED to produtored information, or objects, and A" ATTACHED HERETO.	ce at the time, of permit their in	date, and place set forth below the following spection, copying, testing, or sampling of the
Place:		cGhee & Hiers, LLP treet, NE Suite 800 30309	Date and Septemb	d Time: per 6, 2024 at 10:00 a.m.
	y possessed or conti	olled by you at the time, date, a	nd location set	try onto the designated premises, land, or other forth below, so that the requesting party may signated object or operation on it.
Place:			Date and	1 Time:
(d) and attached Date:	(e), relating to your d. August 14, 2024	ur duty to respond to this subp	our protection as	s a person subject to a subpoena, and Rule 45 potential consequences of not doing so, are
	(CLERK OF COURT	OR	Kori E. Wagner
		Signature of Clerk or Deputy Clerk	_	Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing MASP, LLC who issues or requests this subpoena, is: Kori Wagner, Marissa Merrill and Tracy Gilmore, Swift, Currie, McGhee & Heirs, LLP, 1420 Peachtree Street, NE, Suite 800, Atlanta, GA 3030, (404) 874-8800, Kori.wagner@swiftcurrie.com, Marissa.merrill, Tracy.gilmore@swiftcurrie.com

AO 88B (Rev. 2/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises (Page 2)

Civil Action No. 1:23-CV-04247-JPB

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

(This section should not be file	with the court unless required by Fed. R. Civ. P. 45.)
This subpoena for (name of individual and title	e, if any)
was received by me on (date)	
 I personally served the subpoena on t 	he individual at (place) on (date) : or
☐ I left the subpoena at the individual'	s residence or usual place of abode with (name), a person of suitable
age and discretion who resides there, on (a	, and mailed a copy to the individual's last known address; or
I served the subpoena to (name of indivi	dual) , who is designated by law to accept service of process on
behalf of (name of organization) on (da	(e) ; or
☐ I returned the subpoena unexecuted b	ecause ; or
other (specify):	
	of the United States, or one of its officers or agents, I have also attendance, and the mileage allowed by law, in the amount of
\$	
My fees are \$ for travel and \$ for se	rvices for a total of \$
Try lees are \$ for traver and \$ for se	ivices, for a total of \$
I declare under penalty of perjury that thi	information is true
raceiare under penanty of perjury that thi	A
Date: 08/14/2024	Alll
	Server's signature Lisa M. Adair, Paralegal
	Printed name and title
	1420 Peachtree St. NE, Suite 800, Atlanta, GA 30309
	Server's address

Additional information regarding attempted service, etc: Served via Certified Mail

Federal Rule of Civil Procedure 45 (c), (d), and (e) (Effective 12/1/07)

(c) Protecting a Person Subject to a Subpoena.

- (1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction which may include lost earnings and reasonable attorney's fees on a party or attorney who fails to comply.
 - (2) Command to Produce Materials or Permit Inspection.
- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the issuing court for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance. (3) Quashing or Modifying a Subpoena.
- (A) When Required. On timely motion, the issuing court must quash or modify a subpoena that:
 - (i) fails to allow a reasonable time to comply;
- (ii) requires a person who is neither a party nor a party's officer to travel more than 100 miles from where that person resides, is employed, or regularly transacts business in person except that, subject to Rule 45(c)(3)(B)(iii), the person may be commanded to attend a trial by traveling from any such place within the state where the trial is held;
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
 - (iv)subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the issuing court may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information;
- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party; or
- (iii) a person who is neither a party nor a party's officer to incur substantial expense to travel more than 100 miles to attend trial.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

- (d) Duties in Responding to a Subpoena.
- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

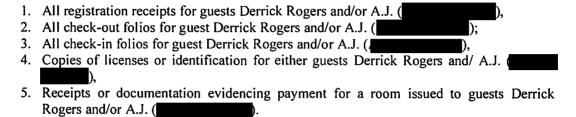
(2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
 - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.
- (e) Contempt. The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty's failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(ii).

4879-9370-0055, v. 1

EXHIBIT "A" MASTER'S INN

A certified copy of:



4874-4188-5655, v. 1

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

A.J. and Q.C.,)
Plaintiff,)) Civil Action No. 1:23-CV-04247-JPB
V.)
MASP, LLC,)
Defendant.)

CERTIFICATE OF AUTHENTICATION PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 45

THE UNDERSIGNED, ________, certifies same is a person responsible for the keeping of records for MASTER'S INN, and the within and attached records are true and accurate reproductions and copies of the records of this facility, which were kept in the aforesaid facility and that said records were kept as reasonably necessary for record keeping.

THIS CERTIFICATE is given pursuant to Federal Rule of Civil Procedure 45 in lieu of the personal appearance of the person certifying hereto, and in connection with a lawsuit involving A.J. and Q.C. v. MASP, LLC.

THE UNDERSIGNED further certifies that said records with this attached Certificate were delivered (pursuant to Federal Rule of Civil Procedure 45) to, Kori E. Wagner, Attorney of Record for MASP, LLC who is the counsel who sought production.

	Records Custodian
	(Please print name)
SWORN TO AND SUBSCRIBED Before me this day of	, 20
Notary Public [SEAL]	
My Commission Expires:	
4878-4008-3927, v. 1	

AO 88B (Rev. 01/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises

UNITED STATES DISTRICT COURT for the NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION A.J. and Q.C., Plaintiff, Civil Action No. 1:23-CV-04247-JPB MASP, LLC, Defendant. SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES To: Motel 6 2820 Chamblee Tucker Road Atlanta, Georgia 30341 Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material: SEE EXHIBIT "A" ATTACHED HERETO. Place: Swift, Currie, McGhee & Hiers, LLP Date and Time: 1420 Peachtree Street, NE Suite 800 September 6, 2024 at 10:00 a.m. Atlanta, Georgia 30309 Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it. Place: Date and Time: The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached. Date: August 14, 2024 **CLERK OF COURT** OR Kori E. Wagner

The name, address, e-mail, and telephone number of the attorney representing MASP, LLC who issues or requests this subpoena, is: Kori Wagner, Marissa Merrill and Tracy Gilmore, Swift, Currie, McGhee & Heirs, LLP, 1420 Peachtree Street, NE, Suite 800, Atlanta, GA 3030, (404) 874-8800, Kori.wagner@swiftcurrie.com, Marissa.merrill, Tracy.gilmore@swiftcurrie.com

Attorney's signature

Signature of Clerk or Deputy Clerk

AO 88B (Rev. 2/09) Subpo	ena to Produce Documents.	Information, or Objects or t	o Permit In	spection of Premises	(Page 2
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Civil Action No. 1:23-CV-04247-JPB

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)
This subpoena for (name of individual and title, if any)
was received by me on (date)
☐ I personally served the subpoena on the individual at (place) on (date); or ☐ I left the subpoena at the individual's residence or usual place of abode with (name), a person of suitable age and discretion who resides there, on (date), and mailed a copy to the individual's last known address; or ☐ I served the subpoena to (name of individual), who is designated by law to accept service of process on behalf of (name of organization) on (date); or
behalf of (name of organization) on (date) ; or
☐ I returned the subpoena unexecuted because ; or
other (specify):
Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of \$
My fees are \$ for travel and \$ for services, for a total of \$
I declare under penalty of perjury that this information is true.
Date: 08/14/2024
Server's signature Lisa M. Adair, Paralegal
Printed name and title
1420 Peachtree St. NE, Suite 800, Atlanta, GA 30309
Server's address

Additional information regarding attempted service, etc: *Served via Certified Mail*

Federal Rule of Civil Procedure 45 (c), (d), and (e) (Effective 12/1/07)

(c) Protecting a Person Subject to a Subpoena.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the issuing court for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance. (3) Quashing or Modifying a Subpoena.
- (A) When Required. On timely motion, the issuing court must quash or modify a subpoena that:
 - (i) fails to allow a reasonable time to comply;
- (ii) requires a person who is neither a party nor a party's officer to travel more than 100 miles from where that person resides, is employed, or regularly transacts business in person except that, subject to Rule 45(c)(3)(B)(iii), the person may be commanded to attend a trial by traveling from any such place within the state where the trial is held;
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
 - (iv)subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the issuing court may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information;
- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party; or
- (iii) a person who is neither a party nor a party's officer to incur substantial expense to travel more than 100 miles to attend trial.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpocnaed person will be reasonably compensated.

(d) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information.

 These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
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- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

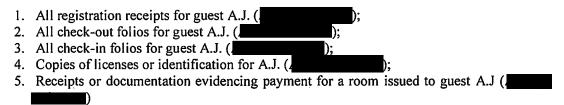
(2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
 - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.
- (e) Contempt. The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty's failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(ii).

4879-9442-0951, v. 1

EXHIBIT "A" MOTEL 6

A certified copy of:



4854-5542-3703, v. 1

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

A.J. and Q.C.,)
Plaintiff,)) Civil Action No. 1:22 CV 04247 IDD
v.) Civil Action No. 1:23-CV-04247-JPB
MASP, LLC,)
Defendant.)

CERTIFICATE OF AUTHENTICATION PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 45

THE UNDERSIGNED, ________, certifies same is a person responsible for the keeping of records for MOTEL 6, and the within and attached records are true and accurate reproductions and copies of the records of this facility, which were kept in the aforesaid facility and that said records were kept as reasonably necessary for record keeping.

THIS CERTIFICATE is given pursuant to Federal Rule of Civil Procedure 45 in lieu of the personal appearance of the person certifying hereto, and in connection with a lawsuit involving A.J. and Q.C. v. MASP, LLC.

THE UNDERSIGNED further certifies that said records with this attached

Certificate were delivered (pursuant to Federal Rule of Civil Procedure 45) to, Kori

E. Wagner, Attorney of Record for MASP, LLC who is the counsel who sought production.

Records Custodian

(Please print name)

SWORN TO AND SUBSCRIBED
Before me this ____ day of _____, 20___.

Notary Public [SEAL]

4857-1029-4999, v. 1

My Commission Expires:

AO 88B (Rev. 01/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises

		UNITED STATES	DISTRIC	T COURT
		fo NORTHERN DIS	or the	BRGIA
			A DIVISION	AGN.
A.J. an	d Q.C.,)	
	Plaintiff,		<u> </u>	
v.) Civil Actio	on No. 1:23-CV-04247-JPB
			į	
MASP	, LLC,)	
	Defendant.)	
	SUBP	OENA TO PRODUCE DOCUM OR TO PERMIT INSE		
То:	Quality Inn	Parkway, N.W.		
	Duluth, Georg			
docume	ents, electronically	SARE COMMANDED to produstored information, or objects, and "A" ATTACHED HERETO.	ice at the time, of the desired in	date, and place set forth below the following spection, copying, testing, or sampling of the
Place:		IcGhee & Hiers, LLP Street, NE Suite 800 a 30309	Date and Septemb	d Time: per 6, 2024 at 10:00 a.m.
	y possessed or con		and location set	try onto the designated premises, land, or other forth below, so that the requesting party may signated object or operation on it.
Place:			Date and	i Time:
(d) and attached Date:	l (e), relating to ye	our duty to respond to this subp	our protection a	s a person subject to a subpoena, and Rule 45 potential consequences of not doing so, are
		CLERK OF COURT	OR	Kori E. Wagner
		Signature of Clerk or Deputy Clerk		Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing MASP, LLC who issues or requests this subpoena, is: Kori Wagner, Marissa Merrill and Tracy Gilmore, Swift, Currie, McGhee & Heirs, LLP, 1420 Peachtree Street, NE, Suite 800, Atlanta, GA 3030, (404) 874-8800, Kori.wagner@swiftcurrie.com, Marissa.merrill, Tracy.gilmore@swiftcurrie.com

AO 88B (Rev. 2/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises (Page 2)

Civil Action No. 1:23-CV-04247-JPB

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

100	
This subpoena for (name of individual and title, if a	ny)
was received by me on (date)	
☐ I personally served the subpoena on the ir	dividual at (place) on (date); or
☐ I left the subpoena at the individual's res	idence or usual place of abode with (name), a person of suitable
age and discretion who resides there, on (date)	, and mailed a copy to the individual's last known address; or
I served the subpoena to (name of individual)	, who is designated by law to accept service of process on
behalf of (name of organization) on (date)	; or
☐ I returned the subpoena unexecuted becau	ise ; or
	, 01
other (specify):	
Unless the subpoena was issued on behalf of the	e United States, or one of its officers or agents, I have also
tendered to the witness fees for one day's atte	ndance, and the mileage allowed by law, in the amount of
\$	
My fees are \$ for travel and \$ for service	es for a total of \$
101 001 1101	
I declare under penalty of perjury that this info	ormation is true
receive under penalty or perjury that this init	A dec.
Date: 08/14/2024	00000
_	Server's signature
Lisa	M. Adair, Paralegal
	Printed name and title
1420	Peachtree St. NE, Suite 800, Atlanta, GA 30309
	Server's address

Additional information regarding attempted service, etc: *Served via Certified Mail*

Federal Rule of Civil Procedure 45 (c), (d), and (e) (Effective 12/1/07)

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- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
 - (i) expressly make the claim; and
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EXHIBIT "A" QUALITY INN DULUTH

A certified copy of:

All registration receipts for guest A.J. ();
 All check-out folios for guest A.J. ();
 All check-in folios for guest A.J. ();
 Copies of licenses or identification for A.J. ();
 Receipts or documentation evidencing payment for a room issued to guest A.J ()

4877-5606-4983, v. 1

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

A.J. and Q.C.,)
Plaintiff,)) Civil Action No. 1:23-CV-04247-JPB
v.)
MASP, LLC,)
Defendant.)

CERTIFICATE OF AUTHENTICATION PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 45

THE UNDERSIGNED,,	certifies	same	is	a
person responsible for the keeping of records for QUALIT	Y INN D	ULUTI	I, ar	ıd
the within and attached records are true and accurate repre	oductions a	and cop	ies o	of
the records of this facility, which were kept in the aforesa	id facility	and tha	ıt sa	id
records were kept as reasonably necessary for record keepin	ıg.			

THIS CERTIFICATE is given pursuant to Federal Rule of Civil Procedure 45 in lieu of the personal appearance of the person certifying hereto, and in connection with a lawsuit involving A.J. and Q.C. v. MASP, LLC.

THE UNDERSIGNED further certifies that said records with this attached Certificate were delivered (pursuant to Federal Rule of Civil Procedure 45) to, Kori E. Wagner, Attorney of Record for MASP, LLC who is the counsel who sought production.

	Records Custodian	
	(Places wint name)	
	(Please print name)	
SWORN TO AND SUBSCRIBED Before me this day of	, 20	
Notary Public [SEAL]		
My Commission Expires:	1000	
4878-5941-7047, v. 1		

AO 88B (Rev. 01/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises

		UNITED STATES		CT COURT
		NORTHERN DIS	for the STRICT OF GEO TA DIVISION	ORGIA
A.J. an	d Q.C.,)	
v.	Plaintiff,))) Civil Acti	on No. 1:23-CV-04247-JPB
)	
MASP,	, LLC,)	
	Defendant.)	
	SUBPO	DENA TO PRODUCE DOCUI OR TO PERMIT INS		
То:	Quality Inn 2170 Delk Roa Marietta, Geor			
docume	ents, electronically	ARE COMMANDED to procestored information, or objects, as "A" ATTACHED HERETO.	luce at the time, nd permit their in	date, and place set forth below the following aspection, copying, testing, or sampling of the
Place:		cGhee & Hiers, LLP Street, NE Suite 800 1 30309		d Time: ber 6, 2024 at 10:00 a.m.
propert	y possessed or cont	rolled by you at the time, date,	and location ser	atry onto the designated premises, land, or other t forth below, so that the requesting party may esignated object or operation on it.
Place:	Date and Time:			d Time:
(d) and attached Date:	(e), relating to yo	Fed. R. Civ. P. 45(c), relating to our duty to respond to this sub	your protection a	as a person subject to a subpoena, and Rule 45 potential consequences of not doing so, are
out.		CLERK OF COURT	OP	V: F 1V
		0:	OR	Kori E. Wagner
		Signature of Clerk or Deputy Clerk		Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing MASP, LLC who issues or requests this subpoena, is: Kori Wagner, Marissa Merrill and Tracy Gilmore, Swift, Currie, McGhee & Heirs, LLP, 1420 Peachtree Street, NE, Suite 800, Atlanta, GA 3030, (404) 874-8800, Kori.wagner@swiftcurrie.com, Marissa.merrill.

Tracy.gilmore@swiftcurrie.com

AO 88B (Rev. 2/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises (Page 2)

Civil Action No. 1:23-CV-04247-JPB

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)
This subpoena for (name of individual and title, if any)
was received by me on (date)
☐ I personally served the subpoena on the individual at (place) on (date) ; or
☐ I left the subpoena at the individual's residence or usual place of abode with (name) , a person of suitable to the subpoena at the individual's residence or usual place of abode with (name)
age and discretion who resides there, on (date) , and mailed a copy to the individual's last known address;
I served the subpoena to (name of individual) , who is designated by law to accept service of process on behalf of (name of organization) on (date) ; or
I returned the subpoena unexecuted because ; or
other (specify):
Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of \$ My fees are \$ for travel and \$ for services, for a total of \$
Ny ices are \$ for traver and \$ for services, for a total of \$
I declare under penalty of perjury that this information is true.
Date: 08/14/2024
Server's signature` Lisa M. Adair, Paralegal
Printed name and title
1420 Peachtree St. NE, Suite 800, Atlanta, GA 30309
Server's address

Additional information regarding attempted service, etc: Served via Certified Mail

Federal Rule of Civil Procedure 45 (c), (d), and (e) (Effective 12/1/07)

(c) Protecting a Person Subject to a Subpoena.

- (1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction which may include lost earnings and reasonable attorney's fees on a party or attorney who fails to comply.
 - (2) Command to Produce Materials or Permit Inspection.
- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the issuing court for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance. (3) Quashing or Modifying a Subpoena.
- (A) When Required. On timely motion, the issuing court must quash or modify a subpoena that:
 - (i) fails to allow a reasonable time to comply;
- (ii) requires a person who is neither a party nor a party's officer to travel more than 100 miles from where that person resides, is employed, or regularly transacts business in person except that, subject to Rule 45(c)(3)(B)(iii), the person may be commanded to attend a trial by traveling from any such place within the state where the trial is held;
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
 - (iv) subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the issuing court may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information;
- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party; or
- (iii) a person who is neither a party nor a party's officer to incur substantial expense to travel more than 100 miles to attend trial.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

- (d) Duties in Responding to a Subpoena.
- (1) Producing Documents or Electronically Stored Information.

 These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
 - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.
- (e) Contempt. The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty's failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(ii).

4887-1662-7671, v. 1

EXHIBIT "A" QUALITY INN

A certified copy of:

- All registration receipts for guest A.J. ();
 All check-out folios for guest A.J. ();
 All check-in folios for guest A.J. ();
 Copies of licenses or identification for A.J. ();
- 5. Receipts or documentation evidencing payment for a room issued to guest A.J. (

4876-8764-5399, v. 1

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

A.J. and Q.C.,)
Plaintiff,)) Civil Action No. 1:23-CV-04247-JPB
v.)
MASP, LLC,)
Defendant.)

CERTIFICATE OF AUTHENTICATION PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 45

THE UNDERSIGNED, ________, certifies same is a person responsible for the keeping of records for QUALITY INN, and the within and attached records are true and accurate reproductions and copies of the records of this facility, which were kept in the aforesaid facility and that said records were kept as reasonably necessary for record keeping.

THIS CERTIFICATE is given pursuant to Federal Rule of Civil Procedure 45 in lieu of the personal appearance of the person certifying hereto, and in connection with a lawsuit involving **A.J. and Q.C. v. MASP, LLC.**

THE UNDERSIGNED further certifies that said records with this attached Certificate were delivered (pursuant to Federal Rule of Civil Procedure 45) to, Kori E. Wagner, Attorney of Record for MASP, LLC who is the counsel who sought production.

	Records Custodian
	(Please print name)
SWORN TO AND SUBSCRIBED Before me this day of	, 20
Notary Public [SEAL] My Commission Expires:	

4855-6002-0951, v. 1

AO 88B (Rev. 01/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises

		UNITED STATES		T COURT	
		NORTHERN DIS		PRGIA	
A.J. an	nd Q.C.,	AILAN	TA DIVISION)		
	Plaintiff,)		
v.) Civil Actio	on No. 1:23-CV-04247-JPB	
MASP	, LLC,))		
1111101	•)		
	Defendant.)		
	SUBF	OENA TO PRODUCE DOCUI OR TO PERMIT INS			
То:	Red Roof Inn 2200 Corporate Plaza Smyrna, Georgia 30080				
docum	ents, electronically	U ARE COMMANDED to product stored information, or objects, at "A" ATTACHED HERETO.	luce at the time, on the standard desired in the standard desired desired in the standard desired desired in the standard desired desi	date, and place set forth below the following spection, copying, testing, or sampling of the	
Place:		McGhee & Hiers, LLP Street, NE Suite 800 ia 30309	Date and Septemb	I Time: per 6, 2024 at 10:00 a.m.	
propert inspect	y possessed or con		and location set	rry onto the designated premises, land, or other forth below, so that the requesting party may signated object or operation on it.	
Place:			Date and	I Time:	
(d) and attached Date:	l (e), relating to y	our duty to respond to this sub		s a person subject to a subpoena, and Rule 45 obtential consequences of not doing so, are	
		CLERK OF COURT	OR	Kori E. Wagner	
		Signature of Clerk or Deputy Clerk		Attorney's signature	
The nar	ne address e-mai	land telephone number of the off	Ornau ranracantir	ng MACR IIIC who issues or requests this	

The name, address, e-mail, and telephone number of the attorney representing MASP, LLC who issues or requests this subpoena, is: Kori Wagner, Marissa Merrill and Tracy Gilmore, Swift, Currie, McGhee & Heirs, LLP, 1420 Peachtree Street, NE, Suite 800, Atlanta, GA 3030, (404) 874-8800, Kori.wagner@swiftcurrie.com, Marissa.merrill, Tracy.gilmore@swiftcurrie.com

AO 88B (Rev. 2/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises (Page	AO 88B	(Rev. 2/09) 5	Subnoena to Produce	Documents Informa	tion or Objects or to I	Permit Inspection of	Premises (Pag	e 2
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Civil Action No. 1:23-CV-04247-JPB

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

This subpoena for (name of individual and title, if any)
was received by me on (date)
☐ I personally served the subpoena on the individual at (place) on (date) : or ☐ I left the subpoena at the individual's residence or usual place of abode with (name) , a person of suitable age and discretion who resides there, on (date) , and mailed a copy to the individual's last known address; or ☐ I served the subpoena to (name of individual) , who is designated by law to accept service of process on behalf of (name of organization) on (date) ; or
☐ I returned the subpoena unexecuted because ; or
other (specify):
Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of
\$
My fees are \$ for travel and \$ for services, for a total of \$
I declare under penalty of perjury that this information is true.
Date: 08/14/2024 White Control of the Control of th
Server's signature Lisa M. Adair, Paralegal
Printed name and title
1420 Peachtree St. NE, Suite 800, Atlanta, GA 30309
Server's address

Additional information regarding attempted service, etc: *Served via Certified Mail*

Federal Rule of Civil Procedure 45 (c), (d), and (e) (Effective 12/1/07)

(c) Protecting a Person Subject to a Subpoena.

- (1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction which may include lost earnings and reasonable attorney's fees on a party or attorney who fails to comply.
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- (ii) requires a person who is neither a party nor a party's officer to travel more than 100 miles from where that person resides, is employed, or regularly transacts business in person except that, subject to Rule 45(c)(3)(B)(iii), the person may be commanded to attend a trial by traveling from any such place within the state where the trial is held;
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
 - (iv)subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the issuing court may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information;
- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party; or
- (iii) a person who is neither a party nor a party's officer to incur substantial expense to travel more than 100 miles to attend trial.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
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- (2) Claiming Privilege or Protection.
- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
 - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.
- (e) Contempt. The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty's failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(ii).

4895-5883-0807, v. 1

EXHIBIT "A" RED ROOF INN

A certified copy of:

All registration receipts for guest A.J. ();
 All check-out folios for guest A.J. ();
 All check-in folios for guest A.J. ();
 Copies of licenses or identification for A.J. ();
 Receipts or documentation evidencing payment for a room issued to guest A.J. ()

4875-7243-3111, v. 1

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

A.J. and Q.C.,)
Plaintiff,))) Civil Action No. 1:23-CV-04247-JPB
v.)
MASP, LLC,)
Defendant.)

CERTIFICATE OF AUTHENTICATION PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 45

THE UNDERSIGNED, _______, certifies same is a person responsible for the keeping of records for **RED ROOF INN**, and the within and attached records are true and accurate reproductions and copies of the records of this facility, which were kept in the aforesaid facility and that said records were kept as reasonably necessary for record keeping.

THIS CERTIFICATE is given pursuant to Federal Rule of Civil Procedure 45 in lieu of the personal appearance of the person certifying hereto, and in connection with a lawsuit involving A.J. and Q.C. v. MASP, LLC.

THE UNDERSIGNED further certifies that said records with this attached

Certificate were delivered (pursuant to Federal Rule of Civil Procedure 45) to, Kori

E. Wagner, Attorney of Record for MASP, LLC who is the counsel who sought production.

Records Custodian

(Please print name)

SWORN TO AND SUBSCRIBED

Before me this _____ day of _______, 20____.

My Commission Expires:

4860-1516-8471, v. 1

AO 88B (Rev. 01/09) Subpoena to Produce Documents. Information, or Objects or to Permit Inspection of Premises

		UNITED STATE	S DISTRIC	T COURT	
		NORTHERN DI	for the STRICT OF GEO	PRGIA	
			TA DIVISION		
A.J. and	d Q.C.,)		
	Plaintiff,))	
v.) Civil Actio)	on No. 1:23-CV-04247-JPB	
MASP,	LLC)		
			Ś		
	Defendant.)		
	SUBP	OENA TO PRODUCE DOCU OR TO PERMIT IN			
То:	Studio 6 1795 Crescent Centre Blvd Tucker, GA 30084				
docume	nts, electronically	U ARE COMMANDED to pro stored information, or objects, a "A" ATTACHED HERETO.	and permit their in	date, and place set forth below the follo spection, copying, testing, or sampling of	wing of the
Place:		AcGhee & Hiers, LLP Street, NE Suite 800 ia 30309	Date and Septemb	d Time: per 6, 2024 at 10:00 a.m.	
property	possessed or con	ntrolled by you at the time, date	, and location set	try onto the designated premises, land, o forth below, so that the requesting part signated object or operation on it.	
Place:	Date and Time:				
(d) and attached	(e), relating to y			s a person subject to a subpoena, and Ru potential consequences of not doing so	
Date:	August 14, 2024	CLERK OF COURT			
			OR	Kori E. Wagner	
		Signature of Clerk or Deputy Clerk		Attorney's signature	

The name, address, e-mail, and telephone number of the attorney representing MASP, LLC who issues or requests this subpoena, is: Kori Wagner, Marissa Merrill and Tracy Gilmore, Swift, Currie, McGhee & Heirs, LLP, 1420 Peachtree Street, NE, Suite 800, Atlanta, GA 3030, (404) 874-8800, Kori.wagner@swiftcurrie.com, Marissa.merrill, Tracy.gilmore@swiftcurrie.com

AO 88B (Rev. 2/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises (Page 2)

Civil Action No. 1:23-CV-04247-JPB

PROOF OF SERVICE

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This subpoena for (name of individual and title, if any) was received by me on (date)
☐ I personally served the subpoena on the individual at (place) on (date) : or ☐ I left the subpoena at the individual's residence or usual place of abode with (name) , a person of suitable age and discretion who resides there, on (date) , and mailed a copy to the individual's last known address; or ☐ I served the subpoena to (name of individual) , who is designated by law to accept service of process on behalf of (name of organization) on (date) ; or
☐ I returned the subpoena unexecuted because ; or
other (specify):
Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of \$ My fees are \$ for travel and \$ for services, for a total of \$
I declare under penalty of perjury that this information is true.
Date: 08/14/2024 Server's signature Lisa M. Adair, Paralegal
Printed name and title
1420 Peachtree St. NE, Suite 800, Atlanta, GA 30309
Server's address

Additional information regarding attempted service, etc: *Served via Certified Mail*

Federal Rule of Civil Procedure 45 (c), (d), and (e) (Effective 12/1/07)

(c) Protecting a Person Subject to a Subpoena.

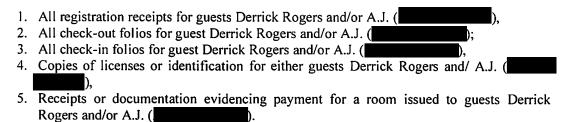
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- (ii) requires a person who is neither a party nor a party's officer to travel more than 100 miles from where that person resides, is employed, or regularly transacts business in person except that, subject to Rule 45(c)(3)(B)(iii), the person may be commanded to attend a trial by traveling from any such place within the state where the trial is held;
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
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- (i) disclosing a trade secret or other confidential research, development, or commercial information;
- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party; or
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- (ii) ensures that the subpoenaed person will be reasonably compensated.

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- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.
- (2) Claiming Privilege or Protection.
- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
 - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.
- (e) Contempt. The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty's failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(ii).

4858-3612-4119, v. 1

EXHIBIT "A" STUDIO 6

A certified copy of:



4854-6479-5607, v. 1

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

A.J. and Q.C.,)
Plaintiff,))) Civil Action No. 1:23-CV-04247-JPE
v.) CIVII ACIIOII No. 1:25-C V-04247-JPE
MASP, LLC,)
Defendant.)

CERTIFICATE OF AUTHENTICATION PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 45

THIS CERTIFICATE is given pursuant to Federal Rule of Civil Procedure 45 in lieu of the personal appearance of the person certifying hereto, and in connection with a lawsuit involving **A.J. and Q.C. v. MASP, LLC.**

THE UNDERSIGNED further certifies that said records with this attached

Certificate were delivered (pursuant to Federal Rule of Civil Procedure 45) to, Kori

E. Wagner, Attorney of Record for MASP, LLC who is the counsel who sought production.

Records Custodian

(Please print name)

SWORN TO AND SUBSCRIBED
Before me this _____ day of ______, 20___.

My Commission Expires:

4862-5070-4855, v. 1